REMARKS

This is in response to the Final Office Action mailed May 25, 2006.

Claims 1, 2, 4 through 8, 10 through 14, 16 through 20 and 22 through 24 are currently pending in the application.

Claims 1, 2, 4 through 8, 10 through 14, 16 through 20 and 22 through 24 stand rejected.

Applicants propose to amend claims 1, 7, 13, and 19, and respectfully request reconsideration of the application as proposed to be amended herein.

35 U.S.C. § 103(a) Obviousness Rejections

Obviousness Rejection Based on U.S. Patent 5,827,771 to Ginn et al. in view of U.S. Patent 5,798,558 to Tyson et al.

Claims 1, 2, 4, 7, 8, 10, 13, 14, 16, 19, 20 and 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ginn et al. (U.S. Patent 5,827,771) in view of Tyson et al. (U.S. Patent 5,798,558). Applicants respectfully traverse this rejection, as hereinafter set forth.

M.P.E.P. 706.02(j) sets forth the standard for a Section 103(a) rejection:

> To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine reference teachings. Second, there must be a reasonable expectation of success. Finally, **the prior art reference (or references when combined) must teach or suggest all the claim limitations.** The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). (Emphasis added).

After carefully considering the cited prior art, the rejection, and the Examiner's comments, Applicants have amended the claimed inventions to clearly distinguish over the cited prior art.

Applicants assert that any combination of the Ginn et al. reference and the Tyson et al. reference does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the claimed inventions of presently amended independent claims 1, 7, 13, and 19

because, at the least, any combination of the Ginn et al. reference and the Tyson et al. reference does not teach or suggest all the claim limitations of the claimed inventions.

Turning to the cited prior art, the Ginn et al. reference teaches or suggests applying a compensating layer 18 to compensate for the bowing of a substrate used for an integrated circuit. The compensating layer 18 used is either SiO_2 or Si_3N_4.

The Tyson et al. reference teaches or suggests a transimpedance amplifer having a passivation layer.

Applicants assert that any combination of the Ginn et al. reference and the Tyson et al. reference does not, at the least, teach or suggest the claim limitations of presently amended independent claims 1, 7, 13, and 19 calling for "a stress-balancing layer covering at least a portion of the back side substantially balancing the stress caused by the passivation layer covering a portion of the integrated circuit, the stress-balancing layer comprising at least one of a metal, a metal alloy, a metallorganic material, a photoresist material, a multifilm layer material for balancing stresses in more than one direction, a tape material for balancing stresses in more than one direction, an adhesive material having reinforcement materials therein, and a temporary adhesive material, a chemical vapor deposition material". Neither the Ginn et al. reference nor the Tyson et al. reference nor any combination of the Ginn et al. reference and the Tyson et al. reference contains any such teaching or suggestion whatsoever to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the claimed inventions of presently amended independent claims 1, 7, 13, and 19. Accordingly, presently amended independent claims 1, 7, 13, and 19 are allowable as well as the dependent claims therefrom.

Obviousness Rejection Based on U.S. Patent 5,827,771 to Ginn et al. in view of U.S. Patent 5,798,558 to Tyson et al. as applied to claims 1, 7, 13 and 19 above, and further in view of U.S. Patent 5,731,954 to Cheon

Claims 5, 6, 11, 12, 17, 18, 23 and 24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ginn et al. (U.S. Patent 5,827,771) in view of Tyson et al. (U.S. Patent 5,798,558) as applied to claims 1, 7, 13 and 19 above, and further in view of Cheon (U.S. Patent 5,731,954). Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants assert that dependent claims 5, 6, 11, 12, 17, 18, 23, and 24 are allowable as they depend from allowable presently independent claims 1, 7, 13, and 19.

Applicants request entry of this amendment for the following reasons:

The amendment is timely filed.

The amendment places the application in condition for allowance.

The amendment does not require any further search or consideration.

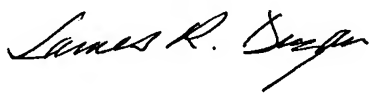
ENTRY OF AMENDMENTS

The proposed amendments to claims 1, 7, 13, and 19 above should be entered by the Examiner because the amendments are supported by the as-filed specification and drawings and do not add any new matter to the application to comply with the provisions of 35 U.S.C. § 132. Further, the amendments do not raise new issues or require a further search. Finally, if the Examiner determines that the amendments do not place the application in condition for allowance, entry is respectfully requested upon filing of a Notice of Appeal herein.

CONCLUSION

Claims 1, 2, 4 through 8, 10 through 14, 16 through 20 and 22 through 24 are believed to be in condition for allowance, and an early notice thereof is respectfully solicited. Should the Examiner determine that additional issues remain which might be resolved by a telephone conference, he is respectfully invited to contact Applicants' undersigned attorney.

Respectfully submitted,



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